

EXHIBIT 6



Planet Depos®
We Make It Happen™

Transcript of Todd A. Webb

Date: March 21, 2024

Case: Karnas, et al. -v- Cuban, et al.

Planet Depos
Phone: 888.433.3767
Email: transcripts@planetdepos.com
www.planetdepos.com

1 IN THE UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF FLORIDA

3 MIAMI DIVISION

4 -----x
5 DOMINIK KARNAS, et al., :
6 Plaintiffs, : Case No.

7 v. : 1:22-cv-22538-ALTMAN/REID

8 MARK CUBAN, et al., :
9 Defendants. :
10 -----x

11
12
13 Videotaped Deposition of

14 TODD A. WEBB

15 Conducted Virtually

16 Thursday, March 21, 2024

17 2:31 p.m. EST

18

19

20

21

22

23 Job No.: 530569

24

Pages: 1 - 127

25

Reported by: Nancy C. Bendish, CCR, RMR, CRR

Transcript of Todd A. Webb
Conducted on March 21, 2024

21

1 kind, plus the interest that we were promised. 14:55:23

2 Q. And you've received some monies 14:55:30

3 back, correct? 14:55:36

4 A. Correct. 14:55:37

5 Q. And how much have you received 14:55:38

6 back from the estate? 14:55:39

7 A. Somewhere in the order of 30 14:55:43

8 percent of what the value of the holdings were 14:55:45

9 at that time. 14:55:50

10 Q. I saw something like \$6,700 or 14:55:52

11 around that? Do you know exactly how much you 14:55:55

12 received back? 14:56:00

13 A. That sounds about right. It's 14:56:01

14 hard for me to pin down exactly like a value, 14:56:08

15 because some of the money I put directly in as 14:56:11

16 US dollars and bought on the Voyager platform, 14:56:14

17 and some was crypto that I transferred over, 14:56:18

18 which each had its own cost basis. 14:56:20

19 Q. Right. However, whatever buttons 14:56:24

20 they pushed in the bankruptcy to get you a 14:56:30

21 number back, I believe I saw it was around 14:56:33

22 \$6700, but we can dig into that in a little bit. 14:56:39

23 But is that about the right number that you 14:56:43

24 recall? 14:56:46

25 A. It's around the right number, 14:56:48

Transcript of Todd A. Webb
Conducted on March 21, 2024

22

1 yeah. 14:56:50

2 Q. Okay. So, I'd like to spend a bit 14:56:51

3 of time unpacking some of your statements. 14:57:09

4 So, let's take the statements that 14:57:12

5 you made and just kind of focus on those first. 14:57:18

6 One of the statements that you 14:57:23

7 made were that all the accounts were earn 14:57:25

8 accounts. Is one of the claims as against Mark 14:57:31

9 if people signed up, all the accounts were earn 14:57:38

10 accounts; does that mean that the members of the 14:57:43

11 class are members that had Earn Program 14:57:46

12 accounts? 14:57:51

13 MR. BUSHMAN: Object to form. 14:57:52

14 Q. What do you mean by the statement, 14:57:53

15 all accounts were earn accounts? 14:57:55

16 A. Well, I believe that all of the 14:58:00

17 accounts at Voyager were eligible for earn. So, 14:58:01

18 if you had an account at Voyager, then you could 14:58:07

19 participate in earning interest or in kind, on 14:58:11

20 any of the cryptos that were supported there. 14:58:19

21 Q. And indeed, indeed that is, I 14:58:24

22 believe, accurate. However, you must agree that 14:58:31

23 the account was self-directed, correct? You 14:58:36

24 made your own investment decisions? 14:58:42

25 A. Yes. 14:58:45

Transcript of Todd A. Webb
Conducted on March 21, 2024

23

1 Q. And that applies to anybody who 14:58:46
2 had an account at Voyager, correct? 14:58:48
3 A. I can't speak to that for other 14:58:51
4 class members. 14:58:55
5 Q. Well, it's in the documents, it's 14:58:56
6 in the agreement that you signed when you signed 14:58:59
7 up for Voyager, and you acknowledged that the 14:59:01
8 account was self-directed. So everybody signed 14:59:06
9 the same documents, right? The process of 14:59:08
10 applying for an account is uniform for everyone, 14:59:11
11 right? 14:59:16
12 A. I suppose, if I understand the 14:59:18
13 question correctly. If you're asking whether 14:59:22
14 every single person that had an account did it 14:59:24
15 on their own and didn't have an investment 14:59:27
16 manager, I don't know that. 14:59:29
17 Q. It's an application, correct? 14:59:36
18 It's an app on your phone, right? 14:59:41
19 A. That's how I interfaced with 14:59:44
20 Voyager, yes. 14:59:46
21 Q. Is there any other way to 14:59:46
22 interface with Voyager than on a phone? 14:59:48
23 A. There's a company there and they 14:59:54
24 have a website. You can contact them directly 14:59:55
25 if you like. 14:59:58

Transcript of Todd A. Webb
Conducted on March 21, 2024

24

1 Q. Yeah, but the account and the use 14:59:59
2 of the account is through an application, not 15:00:05
3 through a website; right? 15:00:08
4 A. I believe so. I don't know if you 15:00:13
5 could buy and sell anything by contacting them 15:00:15
6 directly. 15:00:19
7 Q. Okay. 15:00:22
8 A. I assume most everything was 15:00:23
9 through the application. 15:00:24
10 Q. Give me one second because I 15:00:37
11 didn't think we would have an issue about this. 15:00:41
12 Let me find it. 15:00:43
13 MR. BEST: Can we pull up Exhibit 15:00:55
14 8, please. Mark that Defendant's 1. And then 15:01:00
15 if you can make it just a little bigger, please. 15:01:32
16 (Exhibit Webb 1 was marked and 15:01:37
17 introduced at this time.) 15:01:39
18 Q. I represent to you this is 15:01:39
19 Voyager's customer agreement as updated on 15:01:41
20 August 20th, 2021; that in the process of 15:01:43
21 signing on for an account you had to check -- 15:01:50
22 well, let me just end it, what I represent this 15:01:55
23 to be. 15:01:59
24 Do you remember signing up for 15:02:00
25 your account? 15:02:02

Transcript of Todd A. Webb
Conducted on March 21, 2024

25

1	A.	Yes.	15:02:02
2	Q.	And in the process of signing up	15:02:03
3		for your account, you had to check a box that	15:02:04
4		you read and agreed to the customer agreement	15:02:06
5		before they let you open an account, correct?	15:02:11
6	A.	Correct.	15:02:14
7	Q.	If I can turn your attention to	15:02:15
8		the fifth page of this document, which is	15:02:24
9		paragraph 6, Voyager Services.	15:02:28
10	A.	Okay.	15:02:32
11	Q.	Do you see the first sentence in	15:02:32
12		paragraph number 6, Voyager Services?	15:02:38
13	A.	I do.	15:02:41
14	Q.	And what does it say?	15:02:42
15	A.	It says: "The account is	15:02:44
16		self-directed."	15:02:47
17	Q.	And what do you understand that to	15:02:49
18		mean?	15:02:50
19	A.	That means that you choose what	15:02:51
20		you're going to be investing in within that	15:02:54
21		account.	15:02:57
22	Q.	And again, do you have any reason	15:03:00
23		to believe that this isn't uniform for everybody	15:03:02
24		who signs up on a Voyager platform to start an	15:03:07
25		account?	15:03:13

Transcript of Todd A. Webb
Conducted on March 21, 2024

26

1 A. They may have changed their terms 15:03:14
2 at some point, but otherwise I would think that 15:03:16
3 this is uniform, yes. 15:03:20

4 Q. And if I can turn to section E, 15:03:25
5 which is about the ninth page of this document. 15:03:29
6 It's after number 10. Okay. If we can go to 15:03:51
7 section E, please. 15:04:03

8 And do you see section E? 15:04:07

9 A. I do. 15:04:09

10 Q. Do you see it's in bold as opposed 15:04:09
11 to the rest of the typeface, which was not in 15:04:12
12 bold? 15:04:15

13 A. Okay. 15:04:16

14 MR. BEST: Can you scroll up, 15:04:19
15 please, so that Mr. Webb can see. 15:04:20

16 Q. Do you see how section D is not in 15:04:24
17 bold, for the most part? 15:04:27

18 A. Yes. 15:04:29

19 Q. Can you read to me, please, the 15:04:31
20 title of section E. 15:04:35

21 A. "Rewards Program Risks." 15:04:36

22 Q. Okay. And what's the first risk 15:04:40
23 that's identified; can you read that into the 15:04:42
24 record? 15:04:45

25 A. Sure. "By virtue of entering into 15:04:46

Transcript of Todd A. Webb
Conducted on March 21, 2024

27

1 a commercial arrangement such as this customer 15:04:49
2 agreement, customer is exposed to potential 15:04:51
3 Voyager credit risk. By participating in the 15:04:54
4 Rewards Program customer's cryptocurrency may be 15:04:57
5 at increased risk of loss."

6 Q. And when you signed up for the 15:05:05
7 account you agreed, you acknowledged and 15:05:07
8 understood this risk and accepted it? 15:05:10

9 A. I wouldn't agree that I fully 15:05:15
10 understood the risks that Voyager had, in 15:05:18
11 hindsight, but yes, I understood that there was 15:05:24
12 risk. 15:05:28

13 Q. Some of the risks in hindsight, 15:05:28
14 for instance the three (indiscernible) actually 15:05:33
15 hadn't happened at the time you invested, 15:05:36
16 though, correct? 15:05:38

17 A. I don't know that. 15:05:41

18 Q. Let's look at paragraph 2, "Loans 15:05:46
19 may not be secured." Can you read number 2 into 15:05:49
20 the record, please. 15:05:51

21 A. Sure. "Loans may not be secured. 15:05:52
22 Cryptocurrency subject to a loan will not be 15:05:55
23 held by Voyager or the custodians. Customer 15:05:58
24 understands and acknowledges that Voyager is not 15:06:01
25 responsible for any cryptocurrency that Voyager 15:06:04

Transcript of Todd A. Webb
Conducted on March 21, 2024

41

1 BY MR. BEST: 15:38:02

2 Q. I want to keep focusing on what 15:38:03

3 your view of the class you represent is, 15:38:07

4 Mr. Webb. 15:38:10

5 In continuing to explore the 15:38:14

6 definition of the class, does the class of 15:38:16

7 investors -- and when I use the term 15:38:23

8 "investors," it's those people who opened 15:38:27

9 accounts at Voyager -- does the class have to 15:38:29

10 have any touchpoints to Mark Cuban and the Mavs 15:38:34

11 like you do, with the Mavs code? 15:38:38

12 MR. BUSHMAN: Object to the form. 15:38:41

13 A. I think that is kind of central. 15:38:50

14 Q. And your touchpoint -- without 15:39:06

15 talking to you, one could identify your 15:39:06

16 touchpoint to the Mavs and Mark Cuban as using 15:39:10

17 the MAVS100 code in signing up for a crypto 15:39:15

18 account and using that code; is that a fair 15:39:22

19 statement? 15:39:26

20 A. What exactly do you mean by a 15:39:27

21 touchpoint? 15:39:29

22 Q. If somebody wanted to -- that 15:39:30

23 doesn't interview you -- wanted to see that you 15:39:33

24 may have been exposed to the Mavericks 15:39:36

25 promotional and sponsorship agreement, and 15:39:46

Transcript of Todd A. Webb
Conducted on March 21, 2024

42

1 relied in some way, shape or form on Mark Cuban 15:39:55
2 to open their Voyager account without talking to 15:40:00
3 that person, one way to do it would be to look 15:40:05
4 to see if you used the Mav's promotional code, 15:40:08
5 correct? 15:40:18

6 A. Yes. Although I think it might 15:40:19
7 include people outside that because that 15:40:20
8 promotional code I think was only good for three 15:40:22
9 days. So there may be people that were also 15:40:25
10 influenced but weren't able to join in that 15:40:30
11 three-day period. 15:40:33

12 Q. And I want to talk about those, in 15:40:34
13 a bit. 15:40:36

14 How do you identify those people 15:40:39
15 in the class from just simply looking at the 15:40:41
16 documents? 15:40:45

17 MR. BUSHMAN: Object to the form. 15:40:46

18 Q. Without talking to them, how do 15:40:49
19 you identify those people who may have been 15:40:50
20 influenced by Mark Cuban and the Mavs, but 15:40:59
21 didn't sign up for the promotional code? 15:41:03

22 MR. BUSHMAN: Object to the form. 15:41:05

23 A. That's a good question. If you're 15:41:10
24 looking for how do you prove that, I mean, these 15:41:12
25 are people that say that that's why they joined 15:41:18

Transcript of Todd A. Webb
Conducted on March 21, 2024

43

1	then.	15:41:23
2	Q. But I'd have to interview each one	15:41:24
3	of them, correct?	15:41:26
4	MR. BUSHMAN: Object to the form.	15:41:27
5	A. If they didn't use the MAVS100	15:41:32
6	code?	15:41:35
7	Q. Correct.	15:41:36
8	A. I suppose.	15:41:37
9	Q. Okay. Let me kind of walk through	15:41:38
10	as I see three groupings of people that had	15:41:46
11	Voyager accounts, okay? And just bear with me	15:41:51
12	for 15 seconds, 20 seconds. It's always more.	15:41:55
13	The first group are those Voyager	15:42:00
14	accountholders who signed up for a Voyager	15:42:05
15	account before Mark Cuban and the Dallas	15:42:12
16	Mavericks announced their sponsorship agreement,	15:42:19
17	October 27th, 2021, okay?	15:42:22
18	A. Okay.	15:42:26
19	MR. BUSHMAN: I object to the form	15:42:26
20	of that question. Go ahead.	15:42:27
21	Q. Do you acknowledge that there are	15:42:32
22	a group of people that opened their account	15:42:33
23	before, and traded and invested, before October	15:42:38
24	27th, 2021?	15:42:45
25	A. I assume so. I don't know that.	15:42:48

Transcript of Todd A. Webb
Conducted on March 21, 2024

44

1 Q. Well, you know that Voyager was an 15:42:52
2 active crypto account wallet and had an exchange 15:42:55
3 before you actually opened your account on 15:43:03
4 October 29th, right? 15:43:06
5 A. I would assume so. 15:43:08
6 Q. And do you represent a class of 15:43:12
7 people that opened their accounts before October 15:43:16
8 27th, 2021 and traded before the Mavs' 15:43:22
9 sponsorship announcement? 15:43:28
10 MR. BUSHMAN: Object to form. 15:43:30
11 A. I would say possibly. Sorry. 15:43:32
12 I'd say possibly, if they stayed 15:43:34
13 at Voyager because of -- if they thought the 15:43:37
14 platform was more legitimate because it was 15:43:41
15 backed by the Mavs and Mark Cuban, then I don't 15:43:44
16 know that it should be limited to just people 15:43:48
17 that used the MAV100 code, but anybody that was 15:43:50
18 still there, with their full face in Voyager 15:43:55
19 when it collapsed. 15:43:57
20 Q. And we talked about this just a 15:44:02
21 few minutes ago, which was there's no readily 15:44:05
22 identifiable way to determine whether or not 15:44:11
23 those people stayed because of Mark Cuban 15:44:16
24 without interviewing or talking to them 15:44:22
25 individually, correct? 15:44:26

Transcript of Todd A. Webb
Conducted on March 21, 2024

45

1	MR. BUSHMAN: Object to the form.	15:44:27
2	Q. How would you determine that they	15:44:30
3	stayed in the platform or effected any trades	15:44:33
4	because of Mark Cuban from simply looking at	15:44:41
5	their trading history?	15:44:47
6	MR. BUSHMAN: Object to the form.	15:44:48
7	A. I don't know.	15:44:50
8	Q. How would you -- if I asked you to	15:44:55
9	figure out a way that -- whether or not these	15:44:58
10	people were influenced by Mark Cuban, what would	15:45:04
11	you think that your options are?	15:45:07
12	MR. BUSHMAN: Object to the form.	15:45:09
13	A. Ask them.	15:45:14
14	Q. Individually.	15:45:15
15	MR. BUSHMAN: Object to the form.	15:45:16
16	Q. Correct?	15:45:18
17	A. I don't know about individually.	15:45:21
18	You could easily -- we live in an age of	15:45:23
19	technology. We have -- Voyager has their	15:45:25
20	database. You just send a message to all of	15:45:30
21	them.	15:45:33
22	Q. But you're sending it to each of	15:45:33
23	them individually, is the point?	15:45:36
24	A. Yes.	15:45:39
25	Q. And then there's a group of	15:45:44

Transcript of Todd A. Webb
Conducted on March 21, 2024

46

1 investors that signed up on or after October 15:45:46
2 27th, 2021 that used the Mav's promotional code, 15:45:50
3 just like you, right? 15:45:59
4 A. Okay. 15:46:01
5 Q. Well, would you agree that you're 15:46:03
6 not the only one who used the MAVS100 code? 15:46:05
7 A. I'm pretty sure there's a lot of 15:46:11
8 people that used that code. 15:46:13
9 Q. And those investors are in a like 15:46:19
10 situation to you from the standpoint that they 15:46:22
11 opened their account on or after October 27th 15:46:27
12 and used the MAVS100 code to open their account, 15:46:32
13 correct? 15:46:36
14 A. Okay. 15:46:38
15 Q. Okay. And you represent that 15:46:40
16 class of people, correct? 15:46:43
17 A. Yes. 15:46:45
18 Q. Now, let's talk about the third 15:46:48
19 category, which is investors that opened their 15:46:51
20 account after October 27th, but didn't use the 15:46:59
21 MAVS code. Do you represent those people? 15:47:07
22 A. If they were still in place, 15:47:12
23 they're invested in the Voyager token, and they 15:47:15
24 lost their investment when Voyager collapsed, 15:47:18
25 then I would say yes. 15:47:21

Transcript of Todd A. Webb
Conducted on March 21, 2024

47

1	Q. In that answer you didn't have any	15:47:24
2	touchpoints to Mr. Cuban or the Mavs.	15:47:28
3	MR. BUSHMAN: Object to the form.	15:47:33
4	Q. Do you say that it's not required	15:47:35
5	under that class of people, to have a touchpoint	15:47:37
6	to Mr. Cuban and the Mavs?	15:47:40
7	MR. BUSHMAN: Object to the form.	15:47:43
8	A. I'm not saying that.	15:47:45
9	Q. Okay. So, do they have to have --	15:47:50
10	do the investors who opened their account after	15:47:55
11	October 27th, 2021, but did not use the MAVS	15:47:58
12	code, still have to have a touchpoint to	15:48:05
13	Mr. Cuban and the Mavs to be part of the class	15:48:07
14	you represent?	15:48:11
15	MR. BUSHMAN: Object to the form.	15:48:13
16	A. Am I really expected to know in	15:48:20
17	such painstaking detail? Isn't that a question	15:48:23
18	for the legal team?	15:48:28
19	Q. You're the lead plaintiff in the	15:48:31
20	class. I'm just asking --	15:48:35
21	MR. BUSHMAN: Steve, allow him to	15:48:35
22	finish his answer and then you can ask him the	15:48:37
23	next question.	15:48:39
24	Todd, were you finished with your	15:48:41
25	answer?	15:48:44

Transcript of Todd A. Webb
Conducted on March 21, 2024

48

1	THE WITNESS: Yeah.	15:48:46
2	Q. Do you understand that there may	15:48:48
3	be a group of people who opened their account at	15:48:50
4	Voyager after October 27th, but before the	15:48:53
5	bankruptcy in June or July of 2022, that didn't	15:48:59
6	use the MAVS100 code, correct?	15:49:06
7	A. Yes.	15:49:12
8	Q. And those people, if they didn't	15:49:12
9	redeem, lost money as well, correct?	15:49:14
10	A. Correct.	15:49:17
11	Q. And I'm just trying to determine,	15:49:17
12	that class of people, do you believe there has	15:49:25
13	to be any -- the claim is, you're bringing a	15:49:28
14	claim against the Mavericks and Mark Cuban,	15:49:33
15	right?	15:49:38
16	MR. BUSHMAN: Object to the form.	15:49:39
17	A. Yes.	15:49:40
18	Q. And so necessary to the claim	15:49:40
19	against Mark Cuban and the Dallas Mavericks is	15:49:42
20	that they did something wrong, correct?	15:49:47
21	MR. BUSHMAN: Object to the form.	15:49:52
22	A. Yes.	15:49:58
23	Q. You're lead plaintiff in a case	15:50:00
24	where there have been allegations of conduct by	15:50:02
25	the Dallas Mavericks and Mark Cuban, right?	15:50:08

Transcript of Todd A. Webb
Conducted on March 21, 2024

49

1	A. Yes.	15:50:12
2	Q. And so, now going back to this	15:50:15
3	class of people that opened their account after	15:50:18
4	October 27th but didn't use the MAVS code, the	15:50:21
5	question is do you represent, as the lead	15:50:27
6	plaintiff in this case, those investors who	15:50:30
7	opened their account after October 27th but	15:50:32
8	didn't use the MAVS code, and have no way of	15:50:39
9	showing on its face that they relied in any way,	15:50:44
10	shape or form on Mark Cuban or the Mavs?	15:50:48
11	MR. BUSHMAN: Object to the form.	15:50:54
12	A. All I can say is anybody that	15:51:00
13	invested in the platform where Mark Cuban was a	15:51:02
14	partner and the Mavs were promoting, and that	15:51:10
15	was such a huge deal. I mean, this guy is a	15:51:15
16	billionaire, he's followed by so many people.	15:51:18
17	It's hard for me to believe that somebody could	15:51:21
18	be invested in Voyager and not the right time	15:51:26
19	and not use the code and not be involved in earn	15:51:28
20	and not buy VGX and not have anything to do with	15:51:31
21	the Mavs or Mark Cuban.	15:51:35
22	Q. Well, Mr. Webb, you're a pretty	15:51:40
23	knowledgeable guy in crypto. You know that	15:51:43
24	there are other sponsors and celebrity endorsors	15:51:46
25	of Voyager, correct?	15:51:52

Transcript of Todd A. Webb
Conducted on March 21, 2024

50

1	MR. BUSHMAN: Object to the form.	15:51:53
2	A. I'm not aware of who those are,	15:51:55
3	no.	15:51:58
4	Q. All right. Look, are you aware	15:51:58
5	that there's something called referral codes?	15:52:00
6	Do you know what a referral code is?	15:52:06
7	A. A referral code, yes.	15:52:09
8	Q. What is a referral code, as you	15:52:10
9	understand it in the crypto world?	15:52:13
10	A. That might be something that the	15:52:16
11	platform will reward their existing platform	15:52:23
12	customers by recruiting other people to the	15:52:25
13	platform by using a code, or may be even people	15:52:28
14	that aren't on the platform, they could have an	15:52:37
15	agreement to give them some incentives. Or --	15:52:41
16	Q. Would it surprise you that -- I'm	15:52:46
17	sorry. Were you finished?	15:52:49
18	A. Not exactly, but...	15:52:52
19	Q. No, please, finish the thought.	15:52:54
20	A. It's more of a way to track where	15:53:00
21	their new customers are coming from, what	15:53:05
22	promotions they're putting out there, which ones	15:53:08
23	are working and which ones aren't, right? Am I	15:53:10
24	understanding?	15:53:15
25	Q. 100 percent agree. And in doing	15:53:17

Transcript of Todd A. Webb
Conducted on March 21, 2024

51

1 that, it's evidence that they were not 15:53:19
2 influenced by Mr. Cuban or the Mavs for signing 15:53:24
3 up; they were influenced by something else. 15:53:29
4 Would you agree with that? 15:53:32
5 MR. BUSHMAN: Object to the form. 15:53:33
6 A. Not entirely. Because if somebody 15:53:34
7 followed Mark Cuban and wanted to be on the 15:53:37
8 platform, they missed the MAVS100 code, they may 15:53:40
9 have been searching for other codes. 15:53:45
10 Q. But you can't determine that, as 15:53:46
11 we've discussed, on the face of the documents. 15:53:48
12 You would have to speak to that investor or 15:53:51
13 accountholder individually, correct? 15:53:56
14 MR. BUSHMAN: Object to the form. 15:53:58
15 A. Yes. 15:54:04
16 Q. Would it surprise you -- you know 15:54:05
17 what, let's get into it right now. 15:54:09
18 MR. BEST: Can I have, go to tab 15:54:20
19 32, please. 15:54:25
20 THE TECHNICIAN: Just to confirm, 15:54:43
21 counsel, this is the technician, was that -- 15:54:44
22 MR. BEST: That's the new binder, 15:54:47
23 that's the Twitter feed starting with Rob 15:54:52
24 Gronkowski's Twitter feed on October 15, 2021. 15:54:57
25 THE TECHNICIAN: And what was the 15:55:02

Transcript of Todd A. Webb
Conducted on March 21, 2024

52

1	tab number?	15:55:02
2	MR. BEST: I have 32. I'm sorry.	15:55:03
3	Garrison 32.	15:55:11
4	THE TECHNICIAN: Sorry about that.	15:55:12
5	That's what I was --	15:55:14
6	MR. BEST: I apologize. I'm the	15:55:14
7	slow guy in the room. Everybody else is having	15:55:22
8	to keep me going here.	15:55:25
9	(Exhibit Webb 3 was marked and	15:55:25
10	introduced at this time.)	15:55:25
11	Okay, if you can enlarge that.	15:55:40
12	Q. I'm showing you what's marked as	15:55:42
13	Defendant's, and I apologize, is it 3 or 2?	15:55:44
14	MR. BUSHMAN: 3.	15:55:53
15	Q. Which is, I represent, a fair and	15:55:53
16	accurate screenshot of a Twitter feed from	15:55:56
17	October 15th, 2021. And at the top do you see	15:56:02
18	"Rob Gronkowski reposted"? Do you see that?	15:56:08
19	A. Yes.	15:56:12
20	Q. Do you know who Rob Gronkowski is?	15:56:12
21	A. I believe he's an ex-football	15:56:16
22	player.	15:56:20
23	Q. And do you know that he was a	15:56:20
24	Voyager -- he had a sponsorship agreement with	15:56:27
25	Voyager and promoted Voyager on a routine basis?	15:56:32

Transcript of Todd A. Webb
Conducted on March 21, 2024

53

1	Did you know that?	15:56:39
2	A. I became aware of that later, but	15:56:41
3	not...	15:56:44
4	Q. Okay. So --	15:56:48
5	MR. BUSHMAN: I'm sorry, were you	15:56:49
6	finished? You said "but not"?	15:56:50
7	A. But not that he was repeatedly. I	15:56:58
8	forgot what you said in the end there.	15:57:02
9	Q. And do you see him reposting a	15:57:06
10	Voyager tweet saying that Bitcoin's at an	15:57:11
11	all-time high?	15:57:16
12	A. Okay.	15:57:17
13	Q. And do you see underneath it it	15:57:19
14	says loading and at 99 percent? What do you	15:57:25
15	understand a reposting to do?	15:57:28
16	MR. BUSHMAN: Object to the form.	15:57:33
17	A. I'm a little confused again at	15:57:35
18	what I'm looking at. So this is a --	15:57:37
19	Q. It's a Twitter feed from Voyager	15:57:40
20	about -- as of October 15, 2021, stating that	15:57:43
21	Bitcoin's at an all-time high and it's loading.	15:57:49
22	A. So this is Rob --	15:57:54
23	Q. Rob --	15:57:56
24	A. -- Rob Gronkowski's account and	15:57:59
25	he's reposting something that Voyager posted on	15:58:01